

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

FARES ABDELQADER

No. 19 CR 712

Judge Charles R. Norgle

***UNOPPOSED MOTION FOR ENTRY OF AGREED  
PROTECTIVE ORDER GOVERNING DISCOVERY***

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant ABDELQADER with one count of being a felon in possession of a firearm.
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests and safety of third parties. More specifically, the material that the government intends to produce in discovery may contain, among other information, witness statements provided by the victim in this case.
3. The government has discussed the proposed protective order with counsel for defendant, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Brian J. Kerwin  
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Dated: January 10, 2020